

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

Joseph G. DuMouchelle and Melinda  
J. Adducci

Debtors.

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Chapter 7

Case No. 19-54531

Honorable Lisa Gretchko

Teodor Gelov

Plaintiff,

v.

Joseph G. DuMouchelle and Melinda  
J. Adducci

Defendants.

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Adversary Pro. No. 20-04172

**PLAINTIFF’S LIMITED OBJECTION TO MOTION TO WITHDRAW AS  
ATTORNEY BY PATRICK ANTHONY FOLEY**

Plaintiff, Teodor Gelov, through his undersigned counsel hereby submits his limited objection (“Limited Objection”) to Motion to Withdraw as Attorney by Patrick Anthony Foley (ECF No. 163; the “Withdrawal Motion”). For his Limited Objection, Plaintiff submits that the granting of the Withdrawal Motion should be conditioned on a substitution of counsel having first been filed to prevent undue delay in the progress of this proceeding.

Respectfully submitted by:

**TAFT STETTINIUS & HOLLISTER, LLP**

Dated: August 3, 2023 By: /s/ Jay L. Welford  
Jay L. Welford (P34471)  
Kimberly Ross Clayson (P69804)  
Counsel to Plaintiff  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 3, 2023, my office caused to be served a copy of the *Plaintiff's Limited Objection to Motion to Withdraw as Attorney by Patrick Anthony Foley* using the Court's electronic filing system which will send notice to all ECF participants registered to receive notice.

Respectfully submitted by:

**TAFT STETTINIUS & HOLLISTER, LLP**

Dated: August 3, 2023 By: /s/ Jay L. Welford  
Jay L. Welford (P34471)  
Kimberly Ross Clayson (P69804)  
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